



Colorado Department
of Public Health
and Environment



October 30, 2000

Dorian Brown, Director of Public Works
City of Broomfield
One Descombes Drive
Broomfield, Colorado 80020

Subject: Response to Comments received from the City of Broomfield dated April 18, 2000, regarding changes in Rocky Flats Cleanup Agreement (RFCA) Attachment 5, Action Level Framework (ALF), language to include a new action level monitoring point described in the draft renewal National Pollution Discharge Elimination System (NPDES) permit for Rocky Flats.

Broomfield Comment #1: The linkage between the RFCA/ALF and the NPDES permit is weak and needs further clarification:

- The proposed ALF language provides for an "action level monitoring point" to be established below the v-notch weir following the STP disinfection process, but the Integrated Monitoring Plan makes no mention of an "action level monitoring point."
- The Integrated Monitoring Plan uses the term "Point of Evaluation" (POE), but there is no mention of POE in the NPDES Permit, the Statement of Basis or ALF.

Response: The Site and the Regulators have been using the two terms "Point of Evaluation" and "Action Level Measuring Point" synonymously, and it has lead to some confusion. The following actions address this and clarify what is regulated by the NPDES permit and what is regulated by RFCA:

- The renewal NPDES permit and the Statement of Basis for the Permit has been revised to note that a POE for Plutonium, Americium, Uranium and Tritium has been established in the ALF.
- New ALF language establishing a new POE below the v-notch weir following the STP disinfection process will become effective when the new NPDES permit takes effect. The RFCA Parties anticipate that ALF will be revised after the CWQCC hearing in November and the RSAL debate is concluded. At that time, the entire ALF will be revised replacing the term "Action Level Measuring Point" with "Point of Evaluation."

Broomfield Comment #2: The Current FY 2000 Integrated Monitoring Plan does not include the new POE or "Action Level Measuring Point."

ADMIN RECORD

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

SW-A-004170

2.2 Numeric Levels During Active Remediation (Near-Term Site Condition)

~~C. — POCs/Action Level Measuring Points~~

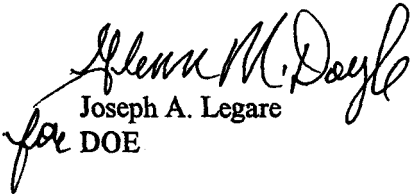
C. Points of Compliance/Points of Evaluation (POEs)

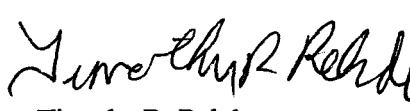

1. In Segment 4a/4b, POCs will be placed at the existing sampling locations for the outfalls of the terminal ponds (Ponds A-4, B-5, and C-2) in both Walnut Creek and Woman Creek. Additional POCs for plutonium, americium, and tritium will be established near where Indiana Street crosses Walnut and Woman Creeks. In the event that exceedances simultaneously occur for either plutonium, americium, or tritium at both the Indiana Street POC and the associated Terminal Pond POC, then this occurrence will be treated as a single enforcement action. As conditions at the RFETS change, the locations of the POCs may need to change. Such changes can be made by agreement of the Parties pursuant to Part 9 of RFCA.
2. In Segment 5, exceedance of action levels will be measured at POEs (also known as Action Level Measuring Points) in the ponds and upstream in the main stream channel at existing gaging/sampling stations or at additional sampling locations in the main stream channel as necessary. A POE in Segment 5 will be established below the v-notch weir following the STP disinfection process. Below the v-notch weir, plutonium, americium, uranium and tritium will be monitored.
3. Compliance will be measured using a 30-day moving average for those contaminants for which this is appropriate. When necessary to protect a particular use, acute and chronic levels will be measured differently as described in the current Integrated Monitoring Plan.

Response: The Integrated Monitoring Plan (IMP) for Fiscal Year 2000 will include the new POE. The new IMP will be distributed in November 2000.

Thank you for taking the time to comment on the changes to ALF. If you have any additional questions, please feel free to contact us.

Sincerely,


for Joseph A. Legare
DOE

 
Timothy R. Rehder
EPA
Steven H. Gunderson
CDPHE

